

REMARKS

This is intended as a full and complete response to the Office Action dated November 27, 2007, having a shortened statutory period for response set to expire on February 27, 2008. Claims 1, 2, 4, 5, 10, 11, 13-17, 51-54, and 56-79 are pending in the application. Please reconsider the claims pending in the application for reasons discussed below.

Claim Rejections Under 35 U.S.C. §102

The Examiner rejected claims 1, 58, 59, 60, and 61 under 35 U.S.C. § 102(b) as being anticipated by *Lima* (U.S. 6,079,498). In response, Applicant has amended claims 1, 58, and 61. Further, Applicant respectfully traverses the rejection of claims 59 and 60.

As amended, claim 1 includes the steps of inserting a tap into the existing pipeline and diverting the fluid flow through the tap to a storage site. Claims 58 and 61 include the steps of providing a pipeline for transporting fluid flow from an offshore well to a storage unit, connecting a flow tube to the existing pipeline at a location between the offshore well and the storage unit and diverting the fluid flow through the flow tube to a floating storage tank (or storage site). Claims 59 and 60 include the steps of (i) diverting the fluid flow to a storage site and (ii) intervening in the pipeline, wherein intervening in the pipeline comprises inserting a tap into the pipeline downstream from the diversion of fluid flow to the storage site and wherein a coiled tubing is lowered from the storage site through a moon pool disposed in a vessel (or through a skid deck displaced to an outboard position) and inserted into the tap for intervening in the pipeline. *Lima* fails to disclose these limitations. *Lima* merely discloses an oil production system that includes a wellhead (35) that is connected to a tank (45) on a platform (34) via a plurality of production flow lines (30, 31, 32 and 33) that are interconnected (see *Lima*, col. 7, lines 46-51 and Figure 3). *Lima* further discloses a mechanical interface (29) that is pumped through the production lines (30, 31, 32, and 33) from a launch device (38) to a receiving device (38) in order to push along a volume of hydrocarbon mixture which has accumulated in the flow lines (see *Lima*, col. 7, lines 58-64). In other words, *Lima* discloses that all the produced hydrocarbon from the wellhead (35) flows directly to the tank (45) rather than inserting a tap (or flow tube) into

an existing pipeline and diverting fluid to a storage site through the tap (or flow tube) as recited in claims 1, 58, and 61 or inserting a tap in the pipeline and lowering a coiled tubing through a moon pool (or through a skid deck) and a tap for intervening in an existing pipeline, as recited in claims 59 and 60.

As the foregoing illustrates, *Lima* fails to teach or suggest all the limitations of claims 1, 58, 59, 60, and 61. This failure precludes *Lima* from anticipating claims 1, 58, 59, 60, and 61. Therefore, Applicant respectfully requests the 102(b) rejection of claims 1, 58, 59, 60, and 61 be removed and the allowance of claims 1, 58, 59, 60, and 61 along with the claims that depend therefrom.

The Examiner rejected claims 1, 58, 59, 60, 61, and 71 under 35 U.S.C. § 102(b) as being anticipated by *Kluth* (U.S. 3,602,302). In response, Applicant has amended claims 1, 58, 61, and 71. Further, Applicant respectfully traverses the rejection of claims 59 and 60.

As amended, claims 1 and 71 include the steps of inserting a tap into the existing pipeline and diverting the fluid flow through the tap to a storage site. Claims 58 and 61 include the steps of providing a pipeline for transporting fluid flow from an offshore well to a storage unit, connecting a flow tube to the existing pipeline at a location between the offshore well and the storage unit and diverting the fluid flow through the flow tube to a floating storage tank (or storage site). Claims 59 and 60 include the steps of (i) diverting the fluid flow to a storage site and (ii) intervening in the pipeline, wherein intervening in the pipeline comprises inserting a tap into the pipeline downstream from the diversion of fluid flow to the storage site and wherein a coiled tubing is lowered from the storage site through a moon pool disposed in a vessel (or through a skid deck displaced to an outboard position) and inserted into the tap for intervening in the pipeline. *Kluth* fails to disclose these limitations. *Kluth* merely discloses an oil production system wherein well fluid from a well (37) flows through a production line (84), a master valve (110), a connecting pipe (112), a wing valve (114) into a header (see *Kluth*, col. 3, lines 42-48 and Figure 2). In other words, *Kluth* discloses that all the well fluid from the well (37) flows directly to a vessel (10) rather than inserting a tap (or flow tube) into an existing pipeline and diverting fluid to a storage site through the tap

(or flow tube) as recited in claims 1, 58, 61, and 71 or inserting a tap in the pipeline and lowering a coiled tubing through a moon pool (or through a skid deck) and a tap for intervening in an existing pipeline, as recited in claims 59 and 60.

As the foregoing illustrates, *Kluth* fails to teach or suggest all the limitations of claims 1, 58, 59, 60, 61, and 71. This failure precludes *Kluth* from anticipating claims 1, 58, 59, 60, 61, and 71. Therefore, Applicant respectfully requests the 102(b) rejection of claims 1, 58, 59, 60, 61, and 71 be removed and the allowance of claims 1, 58, 59, 60, 61, and 71 along with the claims that depend therefrom.

Claim Rejections Under 35 U.S.C. §103

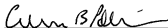
The Examiner rejected claims 14-17, 54, and 62-65 under 35 U.S.C. § 103(a) as being obvious over *Lima* or *Kluth*. Applicant respectfully traverses the rejection. Claims 14-17 and 54 depend from claim 1 and claims 62-65 depends from claim 61. As set forth above, *Lima* or *Kluth* fails to disclose all the limitations of claims 1 and 61. This failure precludes *Lima* or *Kluth* from rendering claims 14-17, 54, and 62-65 obvious. For these reasons, Applicant submits that claims 14-17, 54, and 62-65 are in condition for allowance and respectfully requests withdrawal of the § 103(a) rejection.

The Examiner rejected claims 56 and 79 under 35 U.S.C. § 103(a) as being obvious over *Lima* or the combination of *Kluth* and *Hansen* (EP 1184537). Applicant respectfully traverses the rejection. Claim 56 depends from claim 1 and claim 79 depends from claim 71. As set forth above, *Lima* or *Kluth* fails to disclose all the limitations of claims 1 and 71. Further, *Hansen* fails to cure the deficiencies of *Kluth*. This failure precludes *Lima* or the combination of *Kluth* and *Hansen* from rendering claims 56 and 79 obvious. For these reasons, Applicant submits that claims 56 and 79 are in condition for allowance and respectfully requests withdrawal of the § 103(a) rejection.

Conclusion

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully requests that the claims be allowed.

Respectfully submitted,



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